No. 17-416

IN THE

Supreme Court of the United States

AETNA LIFE INSURANCE COMPANY,

Petitioner,

v.

SALVATORE ARNONE,

Respondent.

CERTIFICATE OF COMPLIANCE

I hereby certify that I am a member in good standing of the bar of this Court and that the Reply Brief for Petitioner contains 2,996 words and complies with the word limitation established by Rule 33.1(g)(iii) of the Rules of this Court.

Dated: November 17, 2017

Lucas C. Townsend